

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

ROBERT E. LYON, JR., Individually and
as Personal Representative of the Estate
of MARY LYON WOLFE,

Plaintiff,

vs.

TAKATA CORPORATION, TAKATA, INC.,
TK HOLDINGS, INC., HIGHLAND
INDUSTRIES, INC., HONDA MOTOR
CO., LTD., HONDA R & D CO., LTD.,
AMERICAN HONDA MOTOR CO., INC.,
AND HONDA OF AMERICA MFG., INC.

Defendants.

Civil Action No. 5:14-4485-JMC

**WRONGFUL DEATH/SURVIVAL
PRODUCTS LIABILITY ACTION**

JURY TRIAL DEMANDED

**AMERICAN HONDA MOTOR CO., INC.'S
ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

Pursuant to Local Civil Rule 26.01, Defendant American Honda Motor Co., Inc. ("AHM") hereby responds to the Court's Interrogatories and reserves the right to supplement these responses:

LOCAL RULE 26.01 INTERROGATORIES

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: AHM currently does not have enough information to determine whether any person or legal entity may have a subrogation interest in this litigation, but will supplement this response as warranted by discovery.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff's claims are actions at law, which should be tried by a jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: AHM is a wholly owned subsidiary of Honda Motor Co., Ltd., a publicly held company in Japan that owns 100% of AHM's stock.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Based on facts as alleged in the Complaint, venue is proper in this division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: *Sujata v. Takata Corporation, et al.*, No. 3:15-cv-00112-JMC is a products liability action currently pending in this Court involving similar allegations related to airbags in the subject vehicle. The United States Judicial Panel on Multidistrict Litigation ("Panel") issued CTO-1 on February 6, 2015, conditionally transferring the case to the United States District Court for the Southern District of Florida, which has been designated as the MDL Court and assigned the Honorable Frederico A. Moreno MDL Court. See CTO-1, *In re: Takata Airbag Products Liability Litig.*, MDL NO. 2599, ECF No. 306 (J.P.M.L. Feb. 6, 2015).

Horton v. Takata Corporation, et al., No. 2:14-cv-04433-MDL is a putative class action currently pending in this Court involving claims for economic loss allegedly resulting from defective airbags. This action is also subject to CTO-1. *Id.*

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: AHM is correctly identified in Plaintiff's Complaint.

(G) If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting the claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: AHM denies that it is liable to the Plaintiff. AHM does not have enough information to determine whether any other person or legal entity is

liable to it or Plaintiff in whole or part, but will supplement this response as warranted by discovery.

Respectfully submitted,

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Columbia, South Carolina
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